

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

NATALIE HENSHILWOOD, SHAWN
JONES, and PRIME TITLE AGENCY,
INC.,

Plaintiffs,

V.

JPMORGAN CHASE BANK
NATIONAL ASSOCIATION AND JP
MORGAN CHASE & CO.,

Defendants.

[illegible]

CIVIL ACTION NO: 4:25-cv-01926

**SECOND AGREED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO ANSWER OR FILE A RESPONSIVE PLEADING**

Pursuant to Federal Rule of Civil Procedure 6(b) and Southern District of Texas Local Rule 7.8, Defendants, JPMorgan Chase Bank, N.A. and JP Morgan Chase & Co. (collectively, “Defendants”), respectfully move for an additional thirty-day extension of time to answer or otherwise plead in response to the Complaint filed by Plaintiffs, Natalie Henshilwood, Shawn Jones, and Prime Title Agency, Inc. In support of this Motion, Defendants state as follows:

1. On March 31, 2025, Plaintiffs commenced this action by filing their Original Petition (the “Complaint”) in the 215th District Court of Harris County, Texas and requesting service on Defendants. Service was completed on both Defendants on April 4, 2025.

2. On April 28, 2025, Defendants timely removed this matter to this Court. Since no responsive pleading was filed in the state court matter before removal, Defendants' deadline to answer or file any other responsive pleading would have been May 5, 2025.

3. On May 2, 2025, the parties learned that this matter had been assigned to Judge Hanks. Per Judge Hanks's procedures, Counsel for Defendants conferred with counsel for Plaintiffs on May 2, 2025 and requested an extension until May 19, 2025 to answer or otherwise respond to the Complaint, to allow time for the parties to comply with the Court's pre-motion procedures. Counsel for Plaintiffs agreed to this request, a motion was filed [Doc. 5], and the Court granted the motion extending the deadline to May 19, 2025 [Doc. 6].

4. Counsel for Defendants conferred again with counsel for Plaintiffs on May 8, 2025, in a substantive conference to discuss the disputed issues prior to Defendants' anticipated filing of a Motion to Dismiss. The discussion was productive, and the parties are continuing their dialogue in an effort to resolve or narrow the issues. To that end, the parties have agreed to further extend the Defendants' deadline to answer or otherwise respond to Plaintiffs' Complaint until Monday, June 16, 2025.

5. This is Defendants' second request for an agreed extension of time. This request is not being made for the purpose of delay and will not affect any other dates in this case, nor will any party be prejudiced.

WHEREFORE, Defendants, JPMorgan Chase Bank, N.A. and JP Morgan Chase & Co., respectfully request that the Court grant this Motion and enter an order allowing

them until Monday, June 16, 2025, to answer or otherwise plead in response to Plaintiffs' Complaint.

Dated: May 14, 2025

Respectfully submitted,

/s/ Jennifer Tomsen
Jennifer Tomsen
Texas Bar No. 24064535
tomsenj@gtlaw.com
Stephen Edmundson
Texas Bar No. 00796507
edmundsons@gtlaw.com
GREENBERG TRAURIG, LLP
1000 Louisiana Street, Suite 6700
Houston, Texas 77002
Telephone: 713.374.3500
Facsimile: 713.374.3505

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants conferred with counsel for Plaintiffs on May 14, 2025 and Plaintiffs have agreed to the relief sought in this Motion.

/s/ Jennifer Tomsen
Jennifer Tomsen

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 2025 a true and correct copy of the foregoing was served upon all counsel of record via the Court's ECF system.

/s/ Jennifer Tomsen
Jennifer Tomsen